

EXHIBIT A

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Attorneys for Defendants
Radica Enterprises Ltd. d/b/a Radica USA, Ltd. and
Radica Games Limited

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

INFINITE MACHINES, LLC,
Plaintiff,

v.

RADICA ENTERPRISES LTD. d/b/a
RADICA USA LTD. and RADICA
GAMES LIMITED.
Defendants.

Civil Action No. 07-8625-AKH

**DOCUMENT
ELECTRONICALLY FILED**

Declaration of Kevin Brase In Support of Defendants' Motion to Transfer

I, Kevin Brase, declare as follows:

1. My name is Kevin Brase.

2. I am over 18 years of age, I am competent to make this declaration, and I state

that the facts herein are true and correct. I make this declaration based on personal knowledge of the facts set forth herein, as well as my review of the books and records of Radica USA, Inc. ("Radica") that are kept in the ordinary course of its business and information provided to me by persons upon whom I regularly rely in the ordinary course of my duties.

3. I am Vice-President of Product Development for Radica.

4. Radica's principal place of business is in Addison, Texas. Radica's product development teams are located in Addison, Texas and China.

5. In the summer of 2005, Radica employees in Texas conceived of a new toy concept that was internally dubbed "Bitty Bytes." By August 2005, Radica's product design team in Texas had begun working with Radica's product design engineers in China to refine the Bitty Bytes concept, analyze anticipated component and product costs, and develop alternative designs.

6. By early 2006, Radica's product design team in Texas had developed the U.B. Funkeys concept and prepared detailed product specifications for U.B. Funkeys. The final U.B. Funkeys product specification was based on an architecture that had been developed by Radica by early September, 2005.

7. I approached Arkadium Games in January, 2006, to assist Radica in developing artwork and writing software, including games and the U.B. Funkeys web site, in accordance with the product specification developed by Radica in Texas.

8. Radica has fewer than 60 employees.

9. As Radica's Vice-President of Product Development, I am an integral part of Radica's leadership team and have a significant role in the day-to-day operation of the company. Travel to New York for an extended period would impose a hardship on Radica and presents a potential for substantial harm to Radica's business.

10. Radica has no office in New York. Only a single Radica sales employee resides in New York. This employee had no involvement the Bitty Bytes / U.B. Funkeys project.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 15, 2008

A handwritten signature in black ink, appearing to read 'Kevin Brase', is written over a horizontal line.

Kevin Brase
Vice-President of Product Development
Radica USA, Inc.